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July 7, 2025

VIA ECF

Honorable Judge Karoline Mehalchick
U.S. District Court for the Middle District of Pennsylvania
William J. Nealon Federal Building
235 N. Washington Avenue
Scranton, PA 18503

Re: Aquino and Lopez v. Hazleton Area School District - No. 24-CV-206

Dear Judge Mehalchick:

Pursuant to this Court's order, parties have continued to confer regarding search terms for Plaintiffs' Request for Production #23 and #25, but the matter has not yet been resolved. On June 16, 2025, Plaintiffs provided Defendants with a list of specific search terms for both discovery requests at issue. On June 26, Defendants informed us that the platform utilized by the Hazleton Area School District does not allow for searches of emails utilizing wildcard terms. On June 26 and again on July 3, 2025, Plaintiffs requested clarification on this issue, including which platform the District utilized. Defendants responded on July 3 informing Plaintiffs they had not been able to connect with the District's information technology department, and followed up on July 7, 2025, explaining that they had heard back from the department, outlining the platform they use, and stating again that it cannot perform the search for wildcard terms and asked for revised terms.

To expedite the already delayed matter, Plaintiffs will compile a list of terms that the wildcard terms were meant to encompass, and provide to Defendants. Plaintiffs, however, have concerns about the timeline in which the results of such searches will be produced, and have not been able to come to an agreement with Defendants on this issue; thus, Plaintiffs request a further conference with the Court to assist with a resolution.

Respectfully,

A handwritten signature in black ink that reads "Bernadette Reyes". The signature is written in a cursive, flowing style.

Bernadette Reyes

cc: All counsel of record (via ECF)